

EPA's Science Advisory Board Desk Statement

Review of EPA's 2003 Draft Supplemental Guidance For Assessing Cancer Susceptibility From Early-Life Exposure To Carcinogens

In response to a request from EPA's Office of Research and Development (ORD), the Science Advisory Board (SAB) reviewed the Agency's Draft *Supplemental Guidance For Assessing Cancer Susceptibility From Early-Life Exposure To Carcinogens* (Supplemental Guidance). The review was conducted by a SAB Review Panel composed of members of the SAB, EPA's Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) Scientific Advisory Panel (SAP) and EPA's Children's Health Protection Advisory Committee (CHPAC). The SAB report of the review is available on the SAB Website at <http://www.epa.gov/sab>.

Overall, the SAB supports the Agency's conclusion that early life exposure to chemicals that cause cancer through genetic mutations (i.e., mutagenic carcinogens) results in greater risks than from similar exposure during adulthood. Chemical-specific data on cancer risks from early life exposure are not always available. For mutagenic carcinogens, the SAB supports the Agency's use of default adjustments to the cancer slope factors derived from studies of adult exposure. The SAB recommends that the Agency conduct additional analysis to strengthen the scientific basis for the default adjustment values. The SAB also agrees with the Agency that specific guidance for other known modes of carcinogenic action needs to be developed. The SAB also suggests that the Agency reconsider its position on limiting default adjustment factors to mutagenic carcinogens. A default adjustment factor approach could be applied to both mutagenic and non-mutagenic carcinogens with insufficiently characterized or unknown modes of action. The SAB encourages the Agency to rapidly finalize the Cancer Guidelines and the Supplemental Guidance.